

Buddy Garcia, *Chairman*
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Mark R. Vickery, P.C., *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

February 3, 2009

Mr. James D. Colmer, P.E.
Manager – Environmental Management
Lear Corporation
21557 Telegraph Road
Southfield, MI 48033

Re: Approval of Affected Property Assessment Report, dated September 8, 2008
Former Lear Corporation Facility
4 South Industrial Loop, Midland, Midland County, TX
Texas Commission on Environmental Quality (TCEQ) SWR No. 23041
EPA ID No. TXD988065207

Dear Mr. Colmer:

The TCEQ has reviewed the September 8, 2008 Affected Property Assessment Report (APAR) revision. Based on our review, the TCEQ concurs that the investigation has been completed in accordance with 30 Texas Administrative Code (TAC) §350.51. Please note when preparing the Response Action Plan that it will be necessary to conduct a minimum of two years of post-response action groundwater monitoring following the planned injections, which differs from the one year of post-injection monitoring mentioned in the Conclusions and Recommendations section of the APAR.

If the responsible party(s) elects to self-implement Remedy Standard A per the requirements of 30 TAC §350.32, a Self-Implementation Notice (SIN) must be submitted at least 10 days prior to conducting a response action in accordance with 30 TAC §350.92. Alternately, a Response Action Plan (RAP) is required to be submitted in accordance with 30 TAC §350.94 for review and approval. The SIN or RAP must be submitted within 180 days of the date of this letter. Please use the standard reporting forms found on our website at <http://www.tceq.state.tx.us/remediation/trp/guidance.html>.

Questions concerning this letter should be directed to me at (512) 239-2268. When responding by mail, please submit an original and one copy of all correspondence and reports to the TCEQ Remediation Division at Mail Code MC-127. An additional copy should be submitted to the local TCEQ Region Office. The information in the reference block should be included in all submittals.

Sincerely,

A handwritten signature in black ink, appearing to read "Danielle Schleman".

Danielle Schleman, Project Manager
Team 1, Environmental Cleanup Section II
Remediation Division

DES/ok

cc: Waste Program Manager, TCEQ Region 7 Office, Midland

014000



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Affected Property Assessment Report Form

Cover Page

Regulatory ID number (Solid waste registration number, VCP ID number, etc) SWR 23041
check one: ☐ Initial submittal for this on-site property ☒ Subsequent submittal for this on-site property
Report date: September 8, 2008 TCEQ Region No.: 7

Reason for submittal: ☐ Notice of deficiency letter ☐ Enforcement order
☐ Permit ☐ Directives letter
☐ Voluntary response ☒ Other: Updated Document

TNRCC Program (check one)

☒ Corrective Action (Mail Code 127) ☐ Superfund PRP Lead (Mail Code 143)
☐ Voluntary Cleanup Program (Mail Code 221) ☐ Superfund Site Assessment (Mail Code 142)
☐ Superfund State Lead (Mail Code 143) ☐ Municipal Solid Waste Permits (Mail Code 124)

On-Site Property Information

On-Site Property Name: Former Lear Corporation Facility
Physical Address:
Street no. 4 Pre dir: S Street name: Industrial Loop Street type: Road Post dir:
City: Midland County: Midland County Code: 165 Zip: 79701
Nearest street intersection or location description:

Latitude: Degrees, Minutes, Seconds OR Decimal Degrees (indicate one) North 31° 58.328
Longitude: Degrees, Minutes, Seconds OR Decimal Degrees (indicate one) West 102° 06.216

Affected Off-Site Property Information

Affected Off-Site Property Name: Industrial Loop (Midland County Street)
Physical Address:
Street no. 4 Pre dir: S Street name: Industrial Loop Street type: Road Post dir:
City: Midland County: Midland County Code: 165 Zip: 79701
Attach additional page if needed to list all affected off-site properties.
☐ Check if no off-site properties affected.

Contact Person for On-Site Property Information and Acknowledgement

Person (or company) Name: Lear Corporation
Contact Person: Mr. James D. Colmer, P.E. Title: Manager -Environmental Management
Mailing Address: 21557 Telegraph Road
City: Southfield State: MI Zip: 48033 E-mail address jcolmer@lear.com
Phone: (248) 447-4271 Fax: (248) 447-4570

By my signature below, I acknowledge the requirement of §350.2(a) that no person shall submit information to the executive director or to parties who are required to be provided information under this chapter which they know or reasonably should have known to be false or intentionally misleading, or fail to submit available information which is critical to the understanding of the matter at hand or to the basis of critical decisions which reasonably would have been influenced by that information. Violation of this rule may subject a person to the imposition of civil, criminal, or administrative penalties.

Signature of Person [Signature] Name, print: James D. Colmer, P.E. Date: 9-30-2008

014001

Executive Summary

Page C-3 of C-8

ID No.: SWR 23041

Report date: Sept. 9, 2008

Completed exposure pathways identified?

☒ Yes ☐ No

If no, explain why the potential receptors or pathways were not identified, and include in the Conclusions and Recommendations section the actions that will be taken to meet these criteria.

Threatened or Affected Receptors	Check if threatened	Check if affected	List the involved affected property(ies)
Water supply well			
Surface water/sediment			Surface water name:
Building (vapor impact)			Building name:
Underground utility serving as preferential transport pathway			
Underground utility not serving as preferential transport pathway			
Ecological (specify)			
Other (specify)			
<input checked="" type="checkbox"/> Check if no threatened or affected receptors.			

Describe the nature of the threatened or affected receptors and any abatement/stabilization actions conducted to address the situations:

Was the Tier 1 Exclusion Criteria for ecological receptors met? ☒ Yes (passed) ☐ No (failed)

Classification(s) of affected groundwater-bearing unit(s): 1 ~~2~~ 3

Depth to shallowest affected groundwater-bearing unit(s): ~~125~~ 25 feet bgs

Was notification triggered in response to an actual or probable human exposure per §350.55(e)? ☒ Yes ☒ No

If yes, describe the situation that triggered the notification requirement. Include documentation of all notifications in Appendix 12 unless previously provided, in which case indicate date provided to TNRCC.

Were all the appropriate notifications made in accordance with §350.55? ☒ Yes ☐ No

If no, explain why notifications were not made:

Were PCLs exceeded in any media? ☐ No ☒ Yes

If PCLs were exceeded, are all the PCLE zones defined? ☒ Yes ☐ No

If not, discuss the reasons this objective was not met and any alternative actions taken. Include in the Conclusions and Recommendations section the actions that will be taken to completely define the PCLE zones.

Do any of the PCLE zones extend beyond the on-site property boundary? ☒ Yes ☐ No ☐ Unknown

Provide a brief description of the PCLE zones, identify the media for which a remedy is required, and describe potential impacts of the COCs at the affected property.

Impacts to shallow groundwater beneath the site have been documented. During the most recent groundwater sampling event conducted in February 2008, the PCLs for ~~and~~ hexavalent and total Cr were exceeded in wells MW-3 (0.15 and 0.16 mg/L), MW-201 (0.25 and 0.22 mg/L), MW-202 (0.1, 0.36 mg/L), respectively. Wells exceeding only the total chromium PCL included MW-E (0.2 mg/L), MW-304 (0.28 mg/L) and MW-306 (0.15 mg/L).

These wells indicate the impacted groundwater is limited to shallow groundwater in an area approximately 100 ft long and 40 ft wide.

If PCLs are exceeded, has a response action been completed? ☐ Yes ☐ No, will self-implement response action
☒ No, will submit RAP

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CHRONOLOGY OF EVENTS
Former Lear Corporation Facility
Midland, Texas
TCEQ SWR No. 23041

Date(s) of Activity	Description of Activity	Summarize Sampling and Testing Conducted	Summary of Conclusions	Ref. No. ¹
February 2008	Low flow groundwater sampling	chromium (total and hex.) in groundwater	low to ND concentrations	NA
November 2007	Monitor well placement (401); low flow groundwater sampling	chromium (total and hex.) in groundwater	low to ND concentrations	NA
July 2006	Monitor well placement (402-404); low flow groundwater sampling; slug testing	chromium (total and hex.) in groundwater	low to ND concentrations	NA
November 2005	Monitor well placement (200 & 300 series); low flow groundwater sampling; slug testing	chromium (total and hex.) in groundwater	low to ND concentrations	NA
January/February 2004	Monitor well placement; low flow groundwater sampling; slug testing	chromium (total and hex.) in groundwater	low to ND concentrations	1
July 2002	Monitor well placement and low flow groundwater sampling	chromium (total and hex.) in groundwater	low to ND concentrations	2
April 2001	Low flow groundwater sampling	chromium (total and hex.) in groundwater	low to ND concentrations	3
August 2000	Monitor well placement	soil and groundwater analysis for chromium	low to ND concentrations in soil and groundwater	4
July 2000	Subsurface Investigation/ Phase II ESA	four borings to groundwater, analysis for chromium, PCBs	low to ND concentrations in soil and groundwater	5
June 2000	Phase I ESA	None	recommend sampling program	6
1991-1999	Miscellaneous Studies conducted for in-house operations, UST issues, and earlier property transactions	Variety of compounds, however, bulk of assessment activities did not include areas of current concern nor target same COCs.	Information summarized only in June 2000 ESA - sources not available	7
mid to late 1980s	Removal of chillers at the site (suspect source)	None available	Chillers at the site suspected of being the COC source were removed prior to Lear	NA

¹ Corresponds to the reference number in the reference list in Appendix 1.

Geology/Hydrogeology Associated Information. Attachments 2B, 2E, 2F	APAR Worksheet 2.1 ID No.: SWR 23041	Page 2-3 of 2-5 Report date: Sept. 9, 2008
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Groundwater-Bearing Unit

Complete this section for all affected groundwater-bearing units or if the information was collected. Repeat section if more than one groundwater-bearing unit exists at the affected property.

Name of groundwater-bearing unit: Ogallala Formation / Aquifer

Average depth to static groundwater: ft BGS: ~26 ft AMSL: =2786

Type of groundwater-bearing unit: perched ☒ unconfined semi-confined
☐ confined: confining layer: top (ft BGS) bottom (ft BGS)
 bottom of groundwater-bearing unit: ft BGS: Unknown ft AMSL: Unknown

Explain answers as necessary:

Water level fluctuation (+/- ft.): ± 3 (estimated) duration: Unknown
 Groundwater flow direction: Southeast velocity: ft/day: 0.18 cm/sec: 6.2E-05

How does this compare to the regional groundwater flow direction and velocity? Similar to published information

If different, explain:

Is there a vertical component to the groundwater gradient? ☐ Yes ☐ No ☒ Unknown If yes, explain:

The vertical component of the groundwater gradient is unknown for this site, however a slight vertical component is likely.

Predominant lithology: Unk sequence of gravel, sand, silt and clay with cemented layers

Saturated hydraulic conductivity (if known): cm/sec: 0.007
 Hydraulic conductivity test method: grain size ☒ slug test pump test
 other (specify):

Estimated sustainable yield (gal/day), if known: Estimated as greater than 150 gpd but less than 144K gpd
 Method of yield determination: ☒ slug test pump test other (specify):

Provide all aquifer test results and calculations in Attachment 6A. Provide a brief interpretation of these results and a description of any well design, construction or development situations that may have affected the yield estimation.

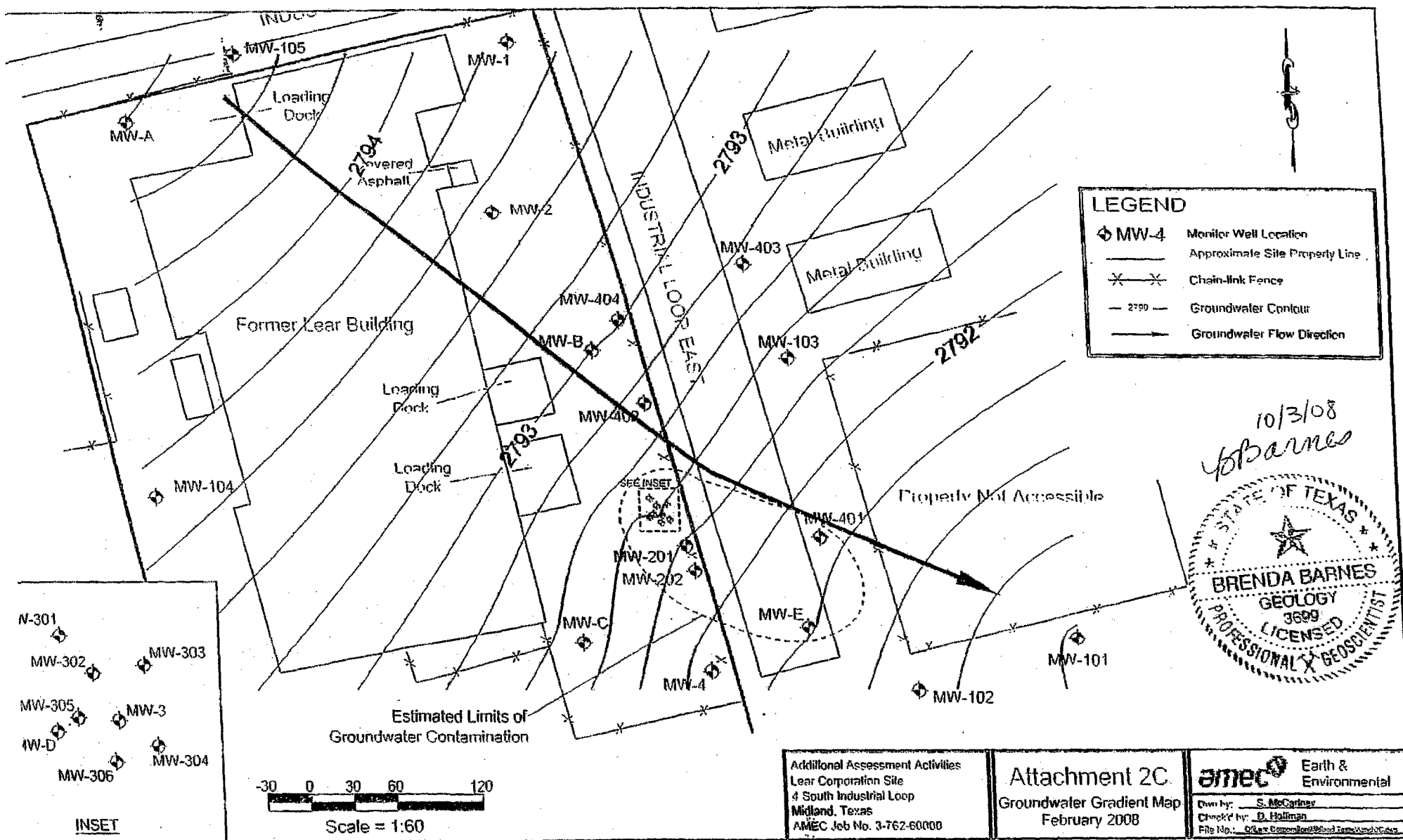
Slug testing was performed on 15 monitoring wells at the site in 2004. The results of the tests indicated a representative hydraulic conductivity (geometric mean of inter-well K's) of 0.007 cm/sec. The results of the slug testing are consistent with the published hydraulic conductivities for a silty-sand formation. Well completion details of MW-4 were not known, thus the K determined for this well was not included in the geometric mean calculation. In addition, the slug tests performed on MW-104 exhibited questionable data and this data was also excluded from the geometric mean.

Volumetric porosity (if known): unknown % Effective porosity (if known): Unknown %

Background total dissolved solids (mg/L): max 1080 min: no. of samples: one
 representative value: 1080 How was the representative value derived? Well sample

If statistically derived, include calculations in Appendix 10.

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ATTACHMENT 2D CUMULATIVE TABLE OF GROUNDWATER MEASUREMENTS

Well ID	DATE	TOC Elevation	Depth to Groundwater	Groundwater Elevation
MW-1	09/06/00	100.00	23.69	76.31
	07/23/02	100.24	24.41	75.83
	01/19/04	2812.16	24.30	2787.86
	11/09/05	2812.16	20.77	2791.39
	07/28/06	2812.16	21.96	2790.20
	11/05/07	2812.16	17.91	2794.25
	02/04/08	2812.16	NM	NM
MW-2	09/06/00	99.36	23.55	75.81
	07/23/02	99.58	24.49	75.09
	01/19/04	2811.50	24.10	2787.40
	11/09/05	2811.50	19.92	2791.58
	07/28/06	2811.50	21.18	2790.32
	11/05/07	2811.50	17.66	2793.84
	02/04/08	2811.50	17.98	2793.52
MW-3	09/06/00	98.85	24.39	74.46
	07/23/04	99.07	25.35	73.72
	01/19/04	2811.04	24.89	2786.15
	11/09/05	2811.04	20.88	2790.16
	02/07/06	2811.04	21.28	2789.76
	07/28/06	2811.04	21.96	2789.08
	11/05/07	2811.04	18.56	2792.48
MW-4	02/04/08	2811.04	18.75	2792.29
	09/06/00	98.62	24.56	74.06
	07/23/02	98.84	25.36	73.48
	01/19/04	2810.80	25.05	2785.75
	11/07/05	2810.80	21.00	2789.80
	07/28/06	2810.80	22.38	2788.42
	11/05/07	2810.80	18.81	2791.99
MW-A	02/04/08	2810.80	18.90	2791.90
	07/23/02	99.59	23.89	75.70
	01/19/04	2812.22	23.68	2788.54
	11/08/05	2812.22	19.54	2792.68
	07/28/06	2812.22	20.86	2791.36
	11/05/07	2812.22	17.54	2794.68
MW-B	02/04/08	2812.22	17.62	2794.60
	07/23/02	99.10	24.46	74.64
	01/19/04	2811.12	24.23	2786.89
	11/09/05	2811.12	20.11	2791.01
	07/28/06	2811.12	21.43	2789.69
	11/05/07	2811.12	17.84	2793.28
MW-C	02/04/08	2811.12	18.12	2793.00
	07/23/02	100.00	26.09	73.91
	01/19/04	2812.15	25.77	2786.38
	11/07/05	2812.15	21.70	2790.45
	07/28/06	2812.15	23.11	2789.04
	11/05/07	2812.15	19.47	2792.68
	02/04/08	2812.15	19.63	2792.52

ATTACHMENT 2D CUMULATIVE TABLE OF GROUNDWATER MEASUREMENTS

Well ID	DATE	TOC Elevation	Depth to Groundwater	Groundwater Elevation
MW- 301	11/09/05	2810.76	20.47	2790.29
	07/28/06	2810.76	NM	NM
	11/05/07	2810.76	NM	NM
	02/04/08	2810.76	NM	NM
MW- 302	11/09/05	2810.81	20.51	2790.30
	07/26/06	2810.81	NM	NM
	11/05/07	2810.81	NM	NM
	02/04/08	2810.81	NM	NM
MW- 303	11/09/05	2810.87	20.51	2790.36
	07/26/06	2810.87	NM	NM
	11/05/07	2810.87	18.41	2792.46
	02/04/08	2810.87	18.49	2792.38
MW- 304	11/09/05	2811.16	20.95	2790.21
	02/07/06	2811.16	21.42	2789.74
	07/28/06	2811.16	22.24	2788.92
	11/05/07	2811.16	18.64	2792.52
	02/04/08	2811.16	18.83	2792.33
MW- 305	11/09/05	2810.99	20.55	2790.44
	07/28/06	2810.99	NM	NM
	11/05/07	2810.99	18.35	2792.64
	02/04/08	2810.99	18.44	2792.55
MW- 306	11/09/05	2810.74	20.81	2789.93
	02/07/06	2810.74	21.06	2789.68
	07/27/06	2810.74	21.87	2788.87
	11/05/07	2810.74	19.31	2791.43
	02/04/08	2810.74	18.45	2792.29
MW-401	11/05/07	2810.41	18.55	2791.86
	02/04/08	2810.41	18.55	2791.86
MW- 402	07/28/06	2810.98	21.56	2789.42
	11/05/07	2810.98	17.98	2793.00
	02/04/08	2810.98	18.25	2792.73
MW- 403	07/28/06	2810.99	21.43	2789.56
	11/05/07	2810.99	18.19	2792.80
	02/04/08	2810.99	18.23	2792.76
MW- 404	07/28/06	2811.24	21.49	2789.75
	11/05/07	2811.24	17.96	2793.28
	02/04/08	2811.24	18.22	2793.02

TOC - Top of Casing elevation. For data prior to 2004, elevations were determined using an established on-site benchmark set to an elevation of 100.00. A site survey including TOC elevations was performed by a licensed surveyor in January 2004. All groundwater measurements after that date are based on the surveyed TOC elevations.

Groundwater Assessment

Associated Information: Attachments 6A, 6B and Appendix 5

APAR Worksheet 6.0

Page 6-1 of 6-6

ID No. SWR 23041

Report date: September 9, 2008

Complete this worksheet for each groundwater-bearing unit assessed.

Affected Property Name(s)/No(s): Former Lear Facility List all affected properties to which this applies

Summarize the nature and extent of COCs in groundwater at the affected property.

Concentrations of total chromium and hexavalent chromium just above the critical PCL of 0.1 mg/L (for both COCs) have been detected in groundwater at the site. During the February 2008 monitoring event, total chromium was observed at concentrations up to 0.25 mg/L (MW-201, property boundary). Hexavalent Cr were observed at concentrations up to 0.36 mg/L (MW-202, property boundary). Concentrations exceeding the PCLs were limited to a 100 by 40 ft area beginning at MW-3 and extending across Industrial Loop East to MW-401. Monitor well MW-D is completed in a zone deeper within the aquifer (screened from 55 to 65 ft below ground surface, bgs). Total and hexavalent chromium concentrations in this well do not exceed the PCLs.

Investigation ApproachName(s) of Groundwater-Bearing Unit(s): Ogallala Formation

List all groundwater-bearing units to which this information applies

Discuss how the groundwater assessment requirements for on-site and if necessary off-site properties have been satisfied. Include the rationale for the selection of groundwater field screening and/or sampling locations in terms of both the placement of monitor wells and the sampling depth. Discuss how the location and construction of the wells provides for the optimum observation of COCs based on the physical and chemical properties of the COCs, migration pathways, the type and location of potential or affected receptors, and on the site-specific hydrogeologic conditions. If screening was conducted and no samples were collected, explain how the screening results justified the decision to not collect samples. Illustrate the monitor well locations on the maps in Attachments 2A and 6B and the monitor well construction details in Attachment 2E.

Groundwater monitoring wells were placed at locations suggested by earlier studies, coupled with plans to monitor down, cross and up gradient locations within the confines of the subject property, as well as off-site down-gradient of the site. Well screens extended from several feet about the water table to at least 5 feet into the aquifer. A total of twenty-six monitor wells are present at the subject site (four placed in August 2000, five placed in July 2002 (MWV-A-E), five placed in January 2004 (MWV-101-105), eight placed in November 2005 (MWV-201 & 202, MWV-301-306), three placed in July 2006 (MWV-402-404), and one placed in November 2007 (MWV-401)). Of the wells, a total of eight have been installed off-site (MWV-E, MWV-101, MWV-102, MWV-103 and MWV-401 through 404). MWV-E, MWV-101, MWV-103 and MWV-401 are located down-gradient from the site. MWV-103 was installed between MWV-3 and an off-site unregistered water well. One of the wells is screened at a depth discrete interval (MWV-D, screened 55 to 60 ft bgs) and is located adjacent to the previously identified impacted well (MWV-3), to verify vertical extent of COCs.

If DNAPLs or LNAPLs are potentially present based on field evidence or COC concentration, are the wells screened in an optimal manner to detect the NAPLs? If no, explain why not:

☒ Yes ☐ No

No DNAPLS or LNAPLS anticipated, and no evidence of such detected.

Was the sampling depth and interval appropriate for the COCs and the geologic/hydrogeologic conditions?

☒ Yes ☐ No

If no, explain why not:

Investigation MethodsName(s) of Groundwater-Bearing Unit(s): Ogallala Formation

List all groundwater-bearing units to which this information applies

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Identify and describe the investigation method(s) used (drilling, hand auger, push probe, etc) if not included in Worksheet 6.0. Discuss the site-specific reasons for choosing the method(s) and explain any atypical procedures or any problems encountered.

Borings were placed using air rotary methods. All monitor wells were completed down hole and were properly screened to allow for monitoring of the upper portion of the aquifer (except for MWV-D, described above). All new well materials were used. Drilling was conducted by a Texas-licensed well driller.

Groundwater Assessment

APAR Worksheet 6.0

Page 6-3 of 6-6

Associated Information: Attachments 6A, 6B and Appendix 5

ID No. SWR 23041

Report date: September 9, 2008

Is the field logbook available upon request? ☒ Yes ☐ No If no, provide justification.Are the monitor wells in good condition? ☒ Yes ☐ No

If no, specify which well(s) and the specific problem. If actions to fix the problem(s) have not been taken, include these measures in the Conclusions and Recommendations portion of the Executive Summary.

Nature and ExtentName(s) of Groundwater-Bearing Unit(s): Ogallala Formation

List all groundwater-bearing units to which this information applies

Have COCs been detected in the groundwater-bearing unit? ☒ Yes ☐ NoWas the lateral extent of the COCs defined to the required assessment level? ☒ Yes ☐ No

If no, explain:

Depict the affected groundwater and the PCLE zone on the cross sections in Attachment 2F and on the maps in Attachment 6B.

Does the affected groundwater extend beyond the on-site property boundary? ☒ Yes ☐ No ☐ Unknown

Discuss any modifications made to the affected groundwater assessment in light of §350.51(a) when there are existing physical controls that will be used in a Remedy Standard B response action.

Has LNAPL been detected? ☐ Yes ☒ No

If yes, and abatement measures have been conducted, provide details in the Chronology.

Has the extent of the LNAPL plume been defined? ☐ Yes ☐ No

If no, explain why not:

Not applicable

LNAPL approximate extent length (ft): _____ width (ft): _____ apparent thickness (ft): _____

Specify well ID number and maximum thickness: _____

Does the LNAPL extend beyond the on-site property boundary? ☐ Yes ☐ No ☐ UnknownIs DNAPL present? ☐ Yes, measured ☐ Yes, suspected based on dissolved concentrations☒ No, and not suspected based on dissolved concentrations

If yes, and abatement measures have been conducted, provide details in the Chronology.

Has the extent of the DNAPL been defined? ☐ Yes ☐ No

If no, explain why not:

Not applicable

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ATTACHMENT 6A1a
Summary of Groundwater Analytical Results - Nov. 2005 through Feb. 2008

	PCL	MW-C	MW-E	MW-3	Dup of MW-3	MW-4	MW-101	MW-102	MW-201	Dup of MW-201	MW-202	Dup of MW-202	MW-304	MW-306	MW-401	MW-402	MW-403	MW-404
Hexavalent Chromium	0.10																	
February 2008		0.010	0.091	0.15	NS	0.015	0.059	0.076	0.25	0.052	0.10	0.18	0.074	0.086	0.059	0.019	0.032	0.024
November 2007		0.0070	0.18	0.090	NS	0.015	0.042	0.071	0.23	0.49	0.24	0.14	0.16	0.098	0.096	0.020	<0.003 U	0.027
July 2006		NS	0.14	0.18	0.18	NS	0.03	0.076	0.23	NS	0.13	0.076	0.086	0.19	X	0.052	<0.0050	0.026
February 2006		NS	0.073	0.18	0.15	NS	0.027	NS	0.38	NS	0.11	NS	0.12	0.17	X	X	X	X
November 2005		NS	0.150	0.16	0.18	NS	NS	0.00	0.76	NS	0.22	NS	0.20	0.22	X	X	X	X
Total Chromium	0.10																	
February 2008		<0.010	0.20	0.16	NS	0.023	0.038	0.033	0.22	0.22	0.36	0.30	0.28	0.15	0.066	0.019	<0.010	0.019
November 2007		<0.010	0.25	0.20	NS	0.026	0.044	0.034	0.26	0.26	0.16	0.17	0.22	0.15	0.10	0.021	0.0050 U	0.016
July 2006		NS	0.24	0.65	0.53	NS	0.041	0.033	0.36	NS	0.12	0.12	0.57	0.43	X	0.037	0.02	0.025
February 2006		NS	0.21	0.21	0.22	NS	0.04	NS	0.45	NS	0.10	NS	0.40	0.32	X	X	X	X
November 2005		NS	0.16	0.18	0.18	NS	NS	0.03	0.75	NS	0.16	NS	0.21	0.26	X	X	X	X

Notes:

Sample results are in mg/L.

PCL = Protective Concentration Level.

Shaded and bold concentrations indicate concentrations that exceed the PCL (0.10 mg/L).

NS = Not Sampled.

X = Well not Installed

U = Concentration is less than the reporting limit.

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**ATTACHMENT 6A1b
 CUMULATIVE GROUNDWATER ANALYTICAL RESULTS**

Sample No.	Monitor Well No.	Date	Total Chromium (mg/L)	Chromium VI (mg/L)	pH (S.U.)
2-157-W-725-D	MW-D	07/25/02	0.048	0.06	NM
		01/20/04	0.051	0.06	8.46
		11/09/05	0.05	0.050	7.35
2-157-W-725-E	MW-E	07/25/02	0.094	0.13	NM
		01/21/04	0.0869	0.09	8.90
		*** 11/07/05	0.16	0.15	7.28
		02/08/06	0.21	0.073	7.28
		07/26/06	0.24	0.14	7.58
		11/07/07	0.25	0.18	7.89
		02/05/08	0.20	0.091	7.72
	MW-101	01/20/04	0.0454	0.050	8.83
		02/08/06	0.04	0.027	7.72
		07/26/06	0.041	0.030	7.93
		11/06/07	0.044	0.042	NM
		02/06/08	0.038	0.059	NM
	MW-102	01/20/04	0.0587	0.020 (U)	9.06
		11/07/05	0.03	0.033	7.36
		07/26/06	0.088	0.072	7.90
		11/06/07	0.054	0.071	NM
		02/05/08	0.063	0.078	NM
	MW-103	01/21/04	0.003 (J)	0.010 (U)	9.00
		11/08/05	<0.01	<0.005	6.51
		07/26/06	NM	NM	NM
		11/07/07	NM	NM	NM
		02/05/08	NM	NM	NM
	MW-104	01/21/04	0.003 (J)	0.010 (U)	9.17
		11/08/05	<0.01	0.005	7.22
		07/26/06	NM	NM	NM
		11/07/07	NM	NM	NM
		02/05/08	NM	NM	NM
	MW-105	01/21/04	0.0009 (J)	0.010 (U)	8.79
		11/08/05	<0.01	<0.005	6.51
		07/26/06	NM	NM	NM
		11/07/07	NM	NM	NM
		02/05/08	NM	NM	NM
MW-502	MW-201 (blind dup of MW-201)	*** 11/08/05	0.75	0.76	7.23
		11/08/05	0.79	0.76	7.23
		02/07/06	0.45	0.38	7.01
MW-100	(blind dup of MW-201)	02/07/08	0.22	0.15	7.01
		07/26/06	0.36	0.23	7.20
		11/06/07	0.26	0.23	7.41
MW-600	(blind dup of MW-201)	11/06/07	0.26	0.49	7.41
		02/06/08	0.22	0.25	7.21
MW-501	(blind dup of MW-201)	02/06/08	0.22	0.052	7.21
	MW-202	*** 11/08/05	0.16	0.22	7.08
		02/08/06	0.10	0.11	7.12
		07/26/06	0.12	0.13	7.15
		07/26/06	0.12	0.076	7.15
MW-500	(blind dup of MW-202)				

**ATTACHMENT 6A1b
 CUMULATIVE GROUNDWATER ANALYTICAL RESULTS**

Sample No.	Monitor Well No.	Date	Total Chromium (mg/L)	Chromium VI (mg/L)	pH (S.U.)
Field Blank		01/22/04	<0.0005	0.010 (U)	NM
		11/06/07	<0.0005	0.003 (U)	NM
		11/07/07	<0.0005	0.003 (U)	NM
TCEQ Risk Based PCL*			0.1**	0.1**	

* - Texas Risk Reduction Program (TRRP), TAC 350, Residential Protective Concentration Level

** - PCL for Class I or II groundwater, Class III PCL 1.0 mg/L

***-Exceeded the holding time in the Nov. 2005 event and was resampled Feb. 2006

mg/L - milligrams per liter

S.U. - standard units

N/A - not analyzed

Bold denotes concentrations > PCL

Qualified Analytical Data Flags

U - Analyte detected in Field Blank at 0.010 mg/L, thus the Method Detection Limit (MDL) was set at 0.05 mg/L for Hexavalent Chromium.

Concentrations with U-flag are less than the MDL.

J - Detected but below the Reporting Limit - Estimated Concentration

ATTACHMENT 6A2 GROUNDWATER GEOCHEMISTRY DATA

Well Number	Date	Calcium (mg/L)	Magnesium (mg/L)	Potassium (mg/L)	Sodium (mg/L)	Chloride (mg/L)	Sulfate (mg/L)	Alkalinity as Bicarbonate (mg/L)	Alkalinity as Carbonate (mg/L)	Total Alkalinity (mg/L)
MW-1	1/22/2004	2560	37.8	4.83	169	165	123	320	<5.00	320
MW-2	1/22/2004	98.1	32.5	5.44	177	135	111	340	<5.00	340
MW-3	1/22/2004	88.1	31.6	5.62	182	155	114	340	<5.00	340
MW-4	1/20/2004	873	19	4.22	122	235	157	360	<5.00	360
MW-A	1/22/2004	113	35.6	8.24	226	230	167	350	<5.00	350
MW-B	1/22/2004	111	37.8	4.39	207	180	129	350	<5.00	350
MW-C	1/20/2004	872	33.8	8.47	278	225	185	360	<5.00	360
MW-D	1/20/2004	2390	27.8	15.3	278	355	250	270	<5.00	270
MW-E	1/21/2004	92.8	38.6	9.74	202	145	135	370	<2.38	370
MW-101	1/20/2004	107	27.5	12.4	261	225	203	300	<5.00	300
MW-102	1/20/2004	100	40.2	15.7	228	285	150	360	<5.00	360
MW-103	1/21/2004	92.1	29.2	5.98	187	140	125	310	<2.38	310
MW-104	1/21/2004	104	33.2	5.99	327	255	216	320	<2.38	320
MW-105	1/21/2004	2390	35.6	5.56	226	235	150	320	<2.38	320
PW-G	1/22/2004	105	29.2	8.42	176	150	168	350	<5.00	350

014014

Reference 15



T/F/IHW 23041 CO
ARTS COMM# 12828009 RP
PROJ. MGR. D-Schleman

21557 Telegraph Road
Southfield, MI 48034
USA

Phone (248) 447-1544
Fax (248) 447-4408

Liam E. Hart, Esq.
Deputy General Counsel
And Chief Compliance Officer
E-mail: lhart@lear.com

September 2, 2009

Ms. Danielle Schleman
VCP-CA Section, VCP Team 2
Remediation Division
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

RE: **Lear Corporation Bankruptcy Notice Regarding the Former Lear Corporation Facility located at 4 South Industrial Loop, Midland, TX, - TCEQ SWR No. 23041 - EP Id. No. TXD988065207 - Customer No. CN600877872 - Regulated Entity No. RN101634962**

Dear Ms. Schleman:

On July 7, 2009, Lear Corporation (Lear) filed for reorganization of its U.S. and Canadian businesses under Chapter 11 of the U.S. Bankruptcy Code. Lear had been conducting investigation and cleanup of a former property located at 4 South Industrial Loop, Midland, TX (the Site) pursuant to a private contractual agreement with the property owner. In light of Lear's bankruptcy, and its rights and obligations as a Chapter 11 debtor, please be advised that Lear is unable to continue investigation and cleanup activities at the Site. We have provided a similar notice to the property owner.

Should you have any questions, please feel free to contact me at (248) 447-1544.

Sincerely,

Liam E. Hart

RECEIVED

SEP 08 2009

REMEDIATION DIVISION

015000